

PROCESSING REQUEST

Reg#	87373-	2	De	ecision	# /	413888	
Descripti	on:	MOW pr	oduct		;		
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					Carl State State Control		
Electroni		阿尔克斯 斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯斯	OR		Steller Steller	Electronic & Letter	
((see PPLS)	•			4.46	ng required)	The second of th
Date Date	ed: 4	1/30/15		□ Da	ted:		
	,	***Only one la	ibel type sh	ould be sele	cted***		
Other N	Tateri a	ls Sent	(see jacl	æt): · · i			27 mg 2 . r
New C	SF(s) Dat	ed: 7/3	1/14		t		
Other:			,				
and clipped to materials to s jacket is full of	ogether, NO staff in the or only avai	OT STAPLED Information ilable as an	. Then gi Services image, pl	ve the jac Center (I ease file r	cket wit SC) (Ro naterial	nust be well or h the coversh oom S-4900). Is in a new jac 703-605-071	eet and If a cket and
Reviewer:	2.	Ferhich					
Division:		/IVBI			,		
Phone:	347	-8560		I	Date:	4/30/15	



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Washington, D.C. 20460

87373-2

Date of Issuance:

4/30/15

NOTICE OF PESTICIDE:

X Registration
Reregistration
(under FIFRA, as amended)

Term of Issuance:

EPA Reg. Number:

Conditional

Name of Pesticide Product:

Deltamethrin Technical

Name and Address of Registrant (include ZIP Code):

Jane Miller Agent to Argite LLC Biologic Consulting, Inc. 115 Obtuse Hill Road Brookfield, CT 06804

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(B). You must comply with the following conditions:

 Submit and/or cite all data required for registration/registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

4/30/15

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

EPA Form 8570-6

- 2. You are required to comply with the data requirements described in the DCI identified below:
 - a. Deltamethrin GDCI-097805-889
 - b. Deltamethrin GDCI-097805-1100
 - c. Deltamethrin GDCI-097805-1210

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://www.epa.gov/oppsrrd1/contacts prd.htm

- 3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 87373-2."
- 4. Submit one copy of the final printed label for the record before you release the product for shipment.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSF:

Basic CSF dated 07/31/2014

If you have any questions, please contact Elizabeth Fertich at (703) 347-8560 or Fertich.elizabeth@epa.gov.

Deltamethrin Technical

An Insecticide for Formulation Use Only

Active Ingredient:	
Deltamethrin*:	98.5%
Other Ingredients:	<u>1.5%</u>
TOTAL	100.0%
*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxylic acid (S)-alph	na-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID					
If Swallowed:	Immediately call a poison control center or doctor for treatment advice.				
	Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. Do not give				
	anything by mouth to an unconscious person.				
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance,				
	then give artificial respiration, preferably mouth-to-mouth, is possible. Call a				
	poison control center or doctor for further treatment advice.				
If on Skin or	Skin or Take off contaminated clothing. Rinse skin immediately with plenty of water				
Clothing:	for 15-20 minutes. Call a poison control center or doctor for treatment advice.				
If in Eyes:	res: Hold eye open and rinse slowly and gently with water for 15-20 minutes.				
	Remove contact lenses, if present, after the first 5 minutes, then continue				
	rinsing eye. Call a poison control center for treatment advice.				
	HOTLINE NUMBER				

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378. You may also contact the National Poison Control Center, 1-800-222-1222 for emergency medical treatment information.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

Net Weight:	25 kg (5	5.12 lbs	50 kg	(110.23 II	bs

Manufactured for: Argite, LLC 102 Guymon Court Morrisville, NC 27560

EPA Reg. No. 87373-X

EPA Est. No. XXXXXX-XXX

ACCEPTED

04/30/2015

Under the Federal Insecticide, Fungicide and Rodenlicide Act as amended, for the pesticide registered under PA Reg. No. 87373-2

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Intended for the formulation into an insecticide for the following uses ONLY:

- 1) Pet collars and topical application to companion animals;
- 2) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s). This product may be used to formulate products for any additional uses not listed on the technical label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable containers. Do not reuse or refill this container. LDPE/Metal Drum with liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Argite, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Argite, LLC To the extent consistent with applicable law, Argite, LLC shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. ARGITE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

Fertich, Elizabeth

From: Sent: To: Cc: Subject: Attachments:	Larry Miller < miller@biologicconsulting.com> Wednesday, April 22, 2015 1:27 PM Fertich, Elizabeth 'Jane M. Miller' Argite, LLC Deltamethrin Technical Data Matrix removed.txt; Argite, LLC Deltamethrin Technical Data Matrix.pdf	
Follow Up Flag: Flag Status:	Follow up Flagged	
Dear Ms. Fertich:		
Jane Miller asked me to sattached .pdf file).	send you the data matrix for the above mentioned prod	iuct (see
Best Regards,		
Larry -		
Lawrence A. Miller BIOLOGIC, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 Tel: (203) 740-1200 Fax: (203) 740-1220		
Email: <u>lmiller@biologicco</u>	nsulting.com	
×		

Fertich, Elizabeth

From:

Fertich, Elizabeth

Sent:

Tuesday, April 21, 2015 4:21 PM

To:

'Jane M. Miller'

Subject:

RE: Pending product application for EPA File Symbol 87373-E--electronic label needed

Thanks for the label corrections. I noticed the MRID is wrong on the data matrix for the storage stability and corrosion characteristics data. According to the authorization letter from Tagros, the MRID is 48623201. Please revise and resubmit the data matrix.

Thanks, Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
fertich.elizabeth@epa.gov
703-347-8560

From: Jane M. Miller [mailto:jmiller@biologicconsulting.com]

Sent: Tuesday, April 21, 2015 3:54 PM

To: Fertich, Elizabeth

Subject: RE: Pending product application for EPA File Symbol 87373-E--electronic label needed

Attached is the corrected label.

Regards, Jane

From: Fertich, Elizabeth [mailto:fertich.elizabeth@epa.gov]

Sent: Tuesday, April 21, 2015 3:31 PM

To: Jane M. Miller

Subject: RE: Pending product application for EPA File Symbol 87373-E--electronic label needed

Jane,

Please see the attached label with 2 minor comments on page 2.

Thanks, Beth

Elizabeth Fertich
US Environmental Protection Agency
Office of Pesticide Programs
Registration Division (7505P)
Invertebrate and Vertebrate Branch 1 (IVB1)
fertich.elizabeth@epa.gov
703-347-8560

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

	DATA	MATRIX			
Date July 31, 2014			EPA Reg. No./File Symbol 87373-XX	Page 1 of 6	
Applicant's/Registrant's Name & A	ddress		Product:		
Argite, LLC c/o Biologic, Inc. 115 C	Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1600	Description of Materials Used to Produce the Product	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1620	Description of Production Process	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1700	Preliminary Analysis	47866502	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1750	Certified Limits	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1800	Enforcement Analytical Method	47866502	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1900	Submittal of Samples				2
830.6302	Color	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6303	Physical State	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6304	Odor	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6313	Stability to normal & elevated temp., metal, metal ion	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6314	Oxidation/Reduction				3
830.6315	Flammability / Flame Extension				4
830.6316	Explodability				5
Signature			Name and Title		Date
Muren	utto hulle.		Lawrence A. Miller, Agent		07/31/2014
Based on EPA Form 8570-35 (9	9-97) Electronic and Paper versions available. Submit only Pa	per version.	Agency Ir	nternal Use Co	ру

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		DATA MATRIX			
Date July 31, 2014			EPA Reg. No./File Symbol 87373-XX	Page 2 of 6	
Applicant's/Registrant's Name & Addr	ess		Product		
Argite, LLC c/o Biologic, Inc. 115 Obto	use Hill Road Brookfield, CT 06804		Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability	48623201	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6319	Miscibility				6
830.6320	Corrosion Characteristics	48623201	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6321	Dielectric Breakdown Voltage				7
830.7000	рН	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7050	UV/Visible Spectrum	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7100	Viscosity				8
830.7200	Melting Point/ Melting Range	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7300	Density	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7370	Dissociation Constant				9
830.7570	Octanol/Water Partition Coefficient	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7840/60	Water Solubility	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.7950	Vapor Pressure	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
Signature	.?		Name and Title	<u> </u>	Date
Charene	the author		Lawrence A. Miller, Agent		07/31/2014
	7) Electronic and Paper versions available. Submi	t only Paper version.	Agency Ir	nternal Use Co	ру

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	DATA N	//ATRIX				
Date July 31, 2014		EPA Reg. No./File Symbol 87373-XX			Page 3 of 6	
Applicant's/Registrant's Name	& Address		Product:			
Argite, LLC c/o Biologic, Inc. 1	15 Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin		· · · · · · · · · · · · · · · · · · ·				
Guideline Reference Number	Guideline Study Name	MF	RID	Submitter	Status	Note
835.2120	Hydrolysis					10
850.2100	Avian Oral Toxicity					11
850.1075	Freshwater Fish Toxicity					11
850.1010	Acute Toxicity Freshwater Invertebrates					11
870.1100	Acute Oral Toxicity	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.1200	Acute Dermal Toxicity	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.1300	Acute inhalation Toxicity	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.2400	Primary Eye Irritation	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.2500	Primary Dermal Irritation	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.2600	Dermal Sensitization	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870. 6100	Delayed Neurotoxicity					12
870.6200	Acute Neurotoxicity	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.3100	90-Day Oral Toxicity (Rodent)					13
870.3150	90-Day Oral Toxicity (Non-Rodent)					13
870.3250	90-Day Dermal Toxicity	CIT	ΓE-ALL	Bayer Environmental Science	Pay	
870.3465	90-Day Inhalation Toxicity					14
870.6100	28 ¹ Day Delayed Neurotoxicity					12
870.6200	90-Day Neurotoxicity	CIT	re-ALL	Bayer Environmental Science	Pay	
Signature				Name and Title		Date
Then	und the suffer			Lawrence A. Miller, Agent		07/31/2014
Based on EPA Form 8570-	35 (9-97) Electronic and Paper versions available. Submit only Pap	er version.		Agency Intern	al Use Cop	у

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		DATA MATRIX			
Date July 31, 2014			EPA Reg. No./File Symbol 87373-XX		Page 4 of 6
Applicant's/Registrant's Name & A	ddress		Product:		
Argite, LLC c/o Biologic, Inc. 115 C	Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.6200	90-Day Neurotoxicity	CITE-ALL	Bayer Environmental Sciences	Pay	
870.4100	Chronic Oral Toxicity				15
870.4200	Carcinogenicity				15
870.3700	Prenatal Development Toxicity	CITE-ALL	Bayer Environmental Sciences	Pay	
870.3800	Reproduction and Fertility Effects	CITE-ALL	Bayer Environmental Science	Pay	
870.6300	Developmental Neurotoxicity				16
870.5100	Bacterial Reverse Mutation Assay	CITE-ALL	Bayer Environmental Science	Pay	
870.5300	In vitro Mammalian Cell Assay	CITE-ALL	Bayer Environmental Science	Pay	
870.5385	In vivo Cytogenetics	CITE-ALL	Bayer Environmental Science	Pay	
870.7485	Metabolism and Pharmacokinetics				17
870.7200	Companion Animal Safety				18
870.7600	Dermal Penetration				19
870.7800	Immunotoxicity	CITE-ALL	Bayer Environmental Science	Pay	
SS.1095	Pet Collar Residue Transfer	CITE-ALL	Bayer Environmental Science	Pay	
		·	·		
	Ź				
Signature			Name and Title		Date
Jamen	with Julla		Lawrence A. Miller, Agent		07/31/2014
Based on EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submi	it only Paper version.	Agenc	y Internal Use Co	рру

DATA MATRIX FOOTNOTES

- Description of Formulation Process: Not applicable because the product is a TGAI/MP.
- 2. Submittal of Samples: Not required at this time.
- 3. Oxidation/Reduction: Not applicable. Product does not contain oxidizing or reducing agents.
- Flammability / Flame Extension: Not applicable. Product does not contain combustible liquids.
- Explodability: Not applicable. Product is not potentially explosive.
- 6. Miscibility: Not applicable. Product is not intended for dilution with petroleum solvents.
- 7. Dielectric Breakdown Voltage: Not applicable. Product is not intended for use around electrical equipment.
- 8. Viscosity: Not required because product is a solid.
- 9. Dissociation Constant: Not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.
- 10. Hydrolysis: Not required since the proposed label is intended only for the formulation of indoor use products.
- 11. Avian Oral Toxicity; Freshwater Fish Toxicity, and; Acute Toxicity Freshwater Invertebrates: Not required since the product is intended only for the formulation of indoor use products having no potential for toxicity to birds and aquatic organisms.
- 12. Delayed Neurotoxicity (Acute and 28-Day): Not required since this product is not an organophosphate or structurally related to other substances that may cause acute or delayed neurotoxicity.
- 13. 90-Day Oral Toxicity (Rodent and Non-Rodent): Not required since this product is intended only for the formulation of non-food use products.
- 14. 90-Day Inhalation Toxicity: Not required since this is a manufacturing use product intended to formulate end-use products that are not likely to result in prolonged inhalation exposure to humans.
- **15. Chronic Oral and Carcinogenicity:** Not required since this product is intended for the formulation of indoor non-food use products, which are not likely to result in significant human exposure over a considerable portion of the human life span.

- **16. Developmental Neurotoxicity:** Not required since this product is not expected to cause treatment-related neurological effects in adults or offspring and the exposure for its intended use is minimal.
- 17. Metabolism and Pharmacokinetics: Not required since chronic toxicity and carcinogenicity studies are not required to support the intended use of this product.
- **18. Companion Animal Safety:** Not required since this is a manufacturing use product not applied directly to companion animals. Registrants of end-use products intended for use on companion animals containing this and other active ingredients may provide safety data to support the registrations of their end-use formulations.
- **19. Dermal Penetration:** Not required since this is a manufacturing use product intended to formulate end-use products that are not likely to result in prolonged dermal exposure to humans.





by five batch analytical data from the manufacturing facility.

3. The proposed product is identical to product

the two products are identical.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

		OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)
		D422707; FILE SYMBOL No.: 87373-E; PRODUCT: Deltamethrin Technical FOOD USE: No
DA	TE:	April 1, 2015
su	BJECT:	Product Chemistry Review of Deltamethrin Technical TGAI / MUP
FR	OM:	Akiva Abramovitch, Ph.D. CITAB/ RD (7505P)
TH	ROUGH:	Shyam Mathur, Ph.D. Product Chemistry Team Leader CITAB/ RD (7505P)
то	:	Carlyn Petrella / Richard Gebken, PM 10 IVB2 / Registration Division (7505P)
		e: Argite LLC. pe: Technical Insecticide (Solid-Powder)
IN٦	RODUCTION	N:
		rgite has submitted a "me-too" registration application for 98.50% Deltamethrin deltamethrin technical TGAI / MUP is produced by
	ATTITION . THE	detaille tilli teolinoa 10/1/Wei is stoddeed by
		asked to evaluate the product chemistry data submitted and determine the similarity of oduct to the registered product.
CO	NCLUSIONS	t:
CIT	TAB has revie	wed the product chemistry data submitted for Deltamethrin TGAI/MUP (produced by and has concluded that:
1.	830 Series g	act chemistry data cited from product corresponding to guidelines group A and group B are acceptable including the storage stability (830.6317) and aracteristics (830.6320) data.
2	The propose	d corrected CSF for basic formulation dated July 31, 2014 is acceptable and is supported

The manufacturing facilities for

Manufacturing process information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment

DP BARCODE: <u>D422707</u>; FILE SYMBOL No.: 87373-E; PRODUCT: <u>Deltamethrin Technical</u>

GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	Basic CSF	A	The NC of AI (98.5%) is supported by 5 batch analysis & agrees with the label claim nominal concentration. The registrant discussed the formation of concentration organic impurities. Only impurities were found at the concentrations of greater than 0.1%.
8301600	Description of materials used to produce the product	478665-01 Cited	A	The description & composition for all the starting materials used to produce deltamethrin technical have been provided by the registrant
830.1620	Description of production process	478665-01 Cited	A	The synthesis of deltamethrin technical is a batch process carried out in two reaction stages followed by a third stage, which includes crystallization, filtration, and drying of the finished product. The production process has been described in full details.
830.1670	Discussion of formation of impurities	478665-01 Cited	A	During the production of deltamethrin tgai/mup, the registrant reported the potential formation of proganic impurities, out of which only impurities were found to be present at the concentrations of ≥ 0.1%, rest of the impurities were found to be present at the concentration of ≤ 0.1% in addition to the The registrant has provided the complete mechanisms of formation, quantification and identification of all the impurities present in the product.
830.1700	Preliminary analysis	478665-02 Cited	А	Five representative batches deltamethrin technical were analyzed for percent active ingredient and the impurities. The active ingredient and the organic impurities were identified and quantified by using HPLC-UV with internal standard quantification methods. The analytical methods used for the assay for the active ingredient and impurities have been described in details.
830.1750	Certified limits	478665-01 Cited	A	The proposed certified limits for the AI are based on standard certified limit table set-forth in 40CFR§158.350(b)(2). The certified limits for the organic impurities were based on the five batch analysis.
830.1800	Enforcement analytical method	478665-02 Cited	А	The HPLC-UV (254 nm) with internal standard method was used for the determination of the AI content in the TGAI/MUP. The method was validated for precision, linearity and accuracy.

DP BARCODE: <u>D422707</u>; FILE SYMBOL No.: 8<u>7373-E</u>; PRODUCT: <u>Deltamethrin Technical</u>

830 Series group B (Physical-Chemical Properties)

GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	478665-03 Cited	А	Off white
830.6303	Physical state	" " "	A	Solid (powder)
830.6304	Odor	ec 41 11	Α	Not performed
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	66 KC KS	A	Test substance was found to be stable with Fe powder, Fe acetate, Al powder and Al acetate during storage at room and at 54°C for 14, 7, 2 and 1 days. The test substance was found to be stable at 54°C and at room temperature for two weeks.
830.6314	Oxidation/reduction: chemical incompatibility		NA	Does not contain any oxidizing or reducing agent
830.6315	Flammability		NA	
830.6316	Explodability		NA	
830.6317	Storage stability	486232 Cited	Α	Stable during 12 months warehouse storage at ambient temperature
830.6319	Miscibility		NA	
830.6320	Corrosion characteristics	486232 Cited	Α	Stable during 12 months warehouse storage at ambient temperature in the storage container
830.7000	pН	478665-03 Cited	Α	4.59 at 20.0°C
830.7050	UV/Visible absorption		А	See Note 1
830.7100	Viscosity		NA	
830.7200	Melting point	478655-03 Cited	Α	100-101°C
830.7220	Boiling point		NA	
830.7300	Relative Density	478665-03 Cited	А	1.5868 @ 25°C
830.7370	Dissociation constants in water (DC)		NA	See Data Matrix (09-10-09) Foot Notes
830.7550	Partition coefficient	478665-03	A	Log Po/w = 5.96

DP BARCODE: <u>D422707</u>; FILE SYMBOL No.: 87373-E; PRODUCT: <u>Deltamethrin Technical</u>

Table 2: Physical and Chemical Properties of : Deltamethrin technical II TGAI / MUP (Tagros, India)								
GLN	Requirement	MRID	Status	Result or Deficiency				
830.7840	Water solubility	478665-03	А	<3.21 ng /ml; See Note 2				
		Cited	ļ — — —					
830.7950	Vapor pressure	478665-03	Α	< 5.910 ^{- 4} Pa at 25°C				
		Cited						

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Upgrade (additional information required); TBA = To Be Assigned

830.1800. Enforcement of analytical method: (MRID No. 478665-02)

Deltamethrin TGAI samples are assayed for the active ingredient content by HPLC with UV detection, following dissolution in benzyl benzoate internal standard solution.

Apparatus & parametrs

Instrument: Waters Alliance 2695 with Waters 2487 Tineable absorbance detector HPLC column: Thermo Hypersil Silica, 250 mm x 4.6 mm, 5 µm particle size

Flow rate: 1.0 ml/min Injection volume: 20 µl

UV detector wavelength: 254 nm

Temperature: Ambient Run time: 15 minutes

Retention time: S-Deltamethrin = ca 8.0 - 9.0 min. Mobile phase: 95.5 (v/v) iso-octane/1, 4-dioxane

830.1550. Product identity: (MRID No. 478665-01)

The Systematic Name, CAS Number and structure of Deltamethrin are depicted below:

Systematic Name (IUPAC):

(S)-α-Cyano-3-Phenoxybenzyl (1RS, 3R)-3-(2, 2-

dibromovinyl)-2, 2-=dimethylcyclopropane

carboxylate

CAS Number:

52918-63-5

Structure:

October 14, 2014

Product Transfer Memo

File Symbol: 87373-E

PRIA Category: R334

Pre-Decisional Date: July 13, 2015

PRIA Due Date: July 27, 2015

From which branch/reviewer: Carlyn Petrella/IB (tel: 347-0439)

Status and Notes:

- What did the PRIA action request to do?
 - New Deltamethrin Technical Product
 - O Claims Similarity to EPA Reg. No.
- Product chemistry, acute toxicity status, efficacy (if required) status?
 - Went through Similarity Clinic. Tox Profile available from Sim Clinic dated 8/8/14.
 - o BEANed to TRB/Chem DP # 422707
 - 45/90 day screen found a deficiency. Registrant was contacted and deficiency corrected. Deficient memo received by TRB/Chem.
 - 45/90 day screen from Shyam Mathur available in Jacket
- No known labelling issues or otherwise at this point.

Petrella, Carlyn

From: Sent: Larry Miller < Imiller@biologicconsulting.com> Thursday, September 18, 2014 2:01 PM

To: Cc: Petrella, Carlyn

Subject:

'Randy Canady'

Attachments:

RE: 45/90 day screen for 87373-E

removed.txt; Argite Confirmation to EPA - Deltamethrin.pdf

Hi Caryln:

Here is the confirmation letter you requested (see attached .pdf file). Let me know if you need anything else. Thanks for your help.

Best Regards,

Larry -

Lawrence A. Miller BIOLOGIC, Inc. 115 Obtuse Hill Road Brookfield, CT 06804

Tel: (203) 740-1200 Fax: (203) 740-1220

Email: lmiller@biologicconsulting.com

×	Name and Address States (Address and States	

From: Petrella, Carlyn [mailto:Petrella.Carlyn@epa.gov]

Sent: Wednesday, September 17, 2014 1:28 PM

To: lmiller@biologicconsulting.com

Subject: FW: 45/90 day screen for 87373-E

Hi Larry,

Attached is the 45/90 day screen from our Chemistry team. I'll have an answer for you shortly on if we need anything further from you.

Thanks for your cooperation, Carlyn *Product ingredient source information may be entitled to confidential treatment*



September 18, 2014

Mr. Mark Suarez
Product Manager, PM Team 13
Insecticide Branch (7505P)
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

SUBJECT: Argite, LLC "Deltamethrin Technical"; EPA File Symbol 87373-E.

Dear Mr. Suarez:

As requested by Ms. Caryln Petrella, this letter confirms that Argite, LLC intends to purchase its deltamethrin technical from as indicated in the as well as the confidential statement of formula submitted with Argite's registration application.

Should you have any questions or otherwise wish to reach me, please feel free to contact my office at 203-740-1200.

Sincerely

Lawrence A. Miller Agent for Argite, LLC

ce: Mr. Randall Canady



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

DP BARCODE No.: <u>D422707</u>; FILE SYMBOL No.: <u>87373-E (screen)</u>; PRODUCT NAME: <u>Deltamethrin</u> <u>Technical</u>; **DECISION No.**:493888; PC Code(s): 097805; ACTION CODE: R334; FOOD Use: Yes

DATE OUT: September 12, 2014

SUBJECT: Completeness check screening for technical product "Deltamethrin Technical"

FROM: Shyam Mathur,

Product Chemistry Team Leader Technical Review Branch/RD (7505P)

TO:

Carlyn Petrella / Mark Suarez, RM 13 Insecticide Branch / RD (7505P)

Company Name: Argite, LLC Formulation Type: Insecticide

Active Ingredient(s): Deltamethrin (98.5%)

MRID No(s).: Cited - 47866501, 47866502, 47866503

Claiming similarity to: Reg. No.

CONCLUSION:

Deficiencies: Yes

(if there are deficiencies they are indicated below each heading as Note 1, Note 2 Etc)

Group A: All required data cited

Note 1: Note 1: The registrant must give a statement that the starting materials (830.1600) and production process (830.1620) for the proposed product are same as for the cited product.

Group B: Cited the data

CSF: Basic CSF (dated 07-31-2014;

Product label: Submitted

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to me or to Joe the corrected deficiencies in response to 10 day letter, so that it can be attached to the original bean, if the data package is still in TRB. New Bean is required in case the bean has been closed by TRB. Thank you.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

CONTAINS CBI - DO NOT RELEASE TO REGISTRANT

SIMILARITY CLINIC MEMORANDUM:

Subject:

EPA Reg. No.: 87373-E/Deltamethrin Technical

DP Barcode: 422301 PC Code: 097805

From:

Marianne Lewis, Biologist

Insecticide-Rodenticide Branch Registration Division (7505P)

To:

Mark Suarez, MM 13

Insecticide Branch

Registration Division (7505P)

Applicant:

Argite, LLC.

c/o Biologic Consulting, Inc.

115 Obtuse Hill Road Brookfield, CT 06804

FORMULATION FROM EPA Reg. No. 87373-E LABEL:

Product ingredient source information may be entitled to confidential treatment

BACKGROUND: The registrant is claiming similarity to and is requesting to "cite-all" on their data matrix to support the registration of their product, EPA Reg. No. 87373-E. After reviewing the CSF's for the subject product and the following Toxicity Categories will be assigned to the subject product: acute oral (81-1) – II, acute dermal (81-2) – III, acute inhalation (81-3) – III, primary eye (81-4) – IV, primary skin (81-5) – III, and will be classified as a non sensitizer.	-

RECOMMENDATIONS:

- The subject product will be assigned the toxicity categories listed above.
- The subject product will be classified as a non sensitizer.

The acute toxicity profile for EPA Reg. No. 87373-E is currently:

acute oral	.11	
acute dermal	III	
acute inhalation	III	
primary eye irritation	IV	
primary skin irritation	III	
dermal sensitization	non sensitize	er

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 087373-E

DELTAMETHRIN TECHNICAL

SIGNAL WORD:

WARNING

AVISO

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

May be fatal if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wear long sleeved shirt and long pants, shoes, socks, and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

Note: the extra statements that the registrant makes in this section are acceptable except for the statement "without damage" – since they are citing data and the only data we have is questionable they can't make this claim.

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

PRIA 3 – 21 Day Content Screen Review Worksheet

Exper	ay Screen Start Date: 8-5-/4 September 2012 ts In-Processing Signature: B.B. Date 8-7 ton management contacted on issues No Yes D	7-14 Pate	Fee I	Paid: Y	es _ /	/
EPA R	Reg. Number: 87373 – E EPA Receipt Date: 8 – 9	5-19	4			
	Items for Review			Yes	No	N/A*
1	1 Application Form (EPA Form 8570-1) signed & complete including package type					
2	Confidential Statement of Formula all boxes completed, form sidated (EPA Form 8570-4)	gned, a	nd	X		
2	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)						
	Certificate and data matrix consistent			X		
i	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
,	If applicable, is there a letter of Authorization for exclusive use only	ly.				
4	Formulator's Exemption Statement (EPA Form 8570-27) compl signed (N/A if source is unregistered or applicant owns the technic		d			X
	Data Matrix (EPA Form 8570-35) both internal and external copic completed and signed (N/A if 100% repack)	es (PR	<u>98-5</u>)	X		
5	a) Selective Method (Fee category experts use)	yes X	no		160	
J	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and available)	guida	nce is	X		
7	Is the data package consistent with PR Notice 86-5					Χ

Notice of Filing included with petitions

9	If applicable for conventional applications, reduced risk rationale		X
	Required Data and/or data waivers. See Footnote C.		
	a) List study (or studies) not included with application		
10			

Comments:

* No studies submitted w/ application
* Technical + impunitus only - no inerty to review

* Jacket PASSED

2

MRID: NONE

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency even if a product is currently registered by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
- 2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
- 3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
- 4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Fee for Service {955968h~

		TO
This package includes the following	for Division	
 New Registration 	OAD	
○ Amendment	OBPPD	
□ Studies? □ Fee Waiver?	● RD	
□ volpay % Reduction:	Risk Mgr.	13
Receipt No. S-	955968	
EPA File Symbol/Reg. No.	87373-E	
Pin-Punch Date:	8/5/2014	
This item is NOT subject to	o FFS action.	
Action Code:	Parent/Child D	ecisions:
Requested: 2334		*
Granted: 2334		
Amount Due: \$ 18,893.00		
☐ Inert Cleared for Intended Use	Uncleared Ine	rt in Product
Reviewer:	Date:	8/6/11
Remarks:		
SIM CLINIC CIT	NE	
SIM CLINIC CITY and all	reg Lech ci	£1 32
		,

Product ingredient source information may be entitled to confidential treatment

Please read instructions on reverse before	con ing form.	Fo	rm Approv	OMB No. 2	070-0060	D. Approval expires 2-28-95	
SEPA Environ	United States mental Protection Washington, DC 20460	Agency	✓	Registra Amendn Other		OPP Identifier Number	
	Application 1	or Pesticide -	Section	1			
1. Company/Product Number 87373-XX		2. EPA Produ M. Suarez	ct Manager		3. Pr	oposed Classification	
4. Company/Product (Name) Deltamethrin Technical		PM# 13		,			
5. Name and Address of Applicant (Include ZIP Code) Argite, LLC c/o Biologic Consulting, Inc. 115 Obtuse Hill Road Brookfield, CT 06804 6. Expedited Reveiw. In accordance with FIFRA Section 3 (b)(i), my product is similar or identical in composition and late to: EPA Reg. No.							
Check if this is a new add		Product N	ame				
ļ		Section - II					
Amendment - Explain below. Resubmission in response to Ager Notification - Explain below.	ncy letter dated	Age. ✓ Me	l printed labe ncy letter dat Too" Applica er - Explain be	ation.	to		
fee for this application is \$18,893. Contact: Jane Miller at email: jmiller@biolo							
		Section - III	06 W 1989 193 15 Mar 2011 52				
1. Material This Product Will Be Package Child-Resistant Packaging Yes ✓ No * Certification must be submitted 1. Material This Product Will Be Package Unit Packag ✓ No If "Yes" Unit Packag	ying W		o. per ontainer	2. Type of (Metal Plastic Glass Paper Other (S	pecify_LDPE bag in drum	
3. Location of Net Contents Information	4. Size(s) Retail C	ontainer	5. Lo	cation of Lab	el Directio	ens	
✓ Label Container 6. Manner in Which Label is Affixed to Pr		lbs. (25, 50 kg)	1 000-00	on label			
6. Manner in Which Label is Affixed to Fr	oduct Lithograph Paper glue Stenciled	d	Other				
	S	ection - IV					
1. Contact Point (Complete items directly	y below for identification of	individual to be con	tacted, if nec	essary, to pro	cess this	apµlicatiun.)	
Name Jane M. Miller	Title Age				Telephone 203-740-	one No. (Include Area Code) 0-1200	
I certify that the statements I have I acknowledge that any knowlinglly both under applicable law.					6. Date Application Received (Stamped)		
2. Signature	3. Ti Age			au 1 3 			
4. Typed Name Jane M. Miller	5. Da	July 31, 2014					



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

August 6, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Decision Number: D-493888

EPA File Symbol or Registration Number: 87373-E Product Name: DELTAMETHRIN TECHNICAL

EPA Receipt Date: 05-Aug-2014 EPA Company Number: 87373 Company Name: ARGITE, LLC

JANE MILLER
BIOLOGIC CONSULTING INC
ARGITE, LLC
115 OBTUSE HILL ROAD
BROOKFIELD, CT 06804

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT; MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT; REQUIRES SCIENCE DATA REVIEW; NEW PHYSICAL FORM; SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

BIOLOGIC CONSULTING, INC. agribusiness professionals

July 31, 2014

Document Processing Desk (REGFEE) Office of Pesticide Programs (7504P) US Environmental Protection Agency One Potomac Yard 2777 S. Crystal Drive Room S-4900, 4th Floor Arlington, VA 22202

Attention:

Mr. Mark Suarez (PM #13)

RE:

Deltamethrin Technical; EPA Reg. No. 87373-XX

Application for Pesticide Registration

Dear Mr. Suarez:

On behalf of Argite, LLC we are submitting an Application for Pesticide Registration for the above mentioned product. The subject product is an insecticide for formulation use only. The nominal concentration of deltamethrin in this formulation is 98.5%.

The following documents are enclosed to process this registration:

Administrative Materials

- Application for Pesticide Registration (EPA Form 8570-1)
- Letter naming Biologic Consulting as agent for this action.
- Letter of Authorization to cite to data.
- Certification with Respect to Citation of Data (EPA Form 8570-34)
- Data Matrix (EPA Form 8570-35)
- Confidential Statement of Formula (EPA Form 8570-4)
- Five (5) copies of draft labeling

To satisfy the product identity and physical/chemical properties data requirements, Argite, LLC has received a letter of authorization to cite to data previously submitted to the Agency (noted by MRID number on the enclosed Data Matrix). To satisfy the acute toxicity data requirements as well as any other data necessary to approve this action, Argite has chosen the citeall option under the selective method of data support and has sent offer to pay letters to those companies listed on the data matrix.

This registration action will fall within the category on Table 4 - Registration Division: New Products, EPA No. R334; CR No. 53. The PRIA fee for this application is \$18, 893.

Should you have any questions, or wish to reach me, please feel free to contact our office at 203-740-1200.

Sincerely,

Agent to Argite, LLC

Larry Miller

From:

pay.gov.clev@clev.frb.org

Sent:

Monday, August 04, 2014 3:10 PM

To:

Randy Canady

Subject:

Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Pay.gov Customer Service at 800-624-1373 or 216-579-2112 or by email at pay.gov.clev@clev.frb.org.

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 25GV2G2C Agency Tracking ID: 74657652939

Transaction Type: Sale

Transaction Date: 08/04/2014 03:09:34 PM EDT

Account Holder Name: Randall V. Canady

Transaction Amount: \$18,893.00 Billing Address: 102 Guymon Court

Billing Address 2: City: Morrisville State/Province: NC Zip/Postal Code: 27560

Country: USA Card Type: Visa

Card Number: ********5873

Registration Number: Company Name: Argite, LLC Company Number: 87373 Action Code: R334

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



July 21, 2014

To Whom It May Concern: RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Lawrence A. Miller and Jane M. Miller of BIOLOGIC, Inc. are authorized to act as agent for Argite, LLC (EPA Company Number 87373), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me at (919) 610-1065.

Sincerely,

Randall V Canady

President & Chief Executive Officer

cc: BIOLOGIC, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460.

Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.					
Certification with Respect to Citation of Data					
Applicant's/Registrant's Name, Address, and Telephone Number Argite, LLC c/o Biologic Consulting, Inc. 115 Obtuse Hill Road Brookfield, CT 0680	EPA Registration Number/File Symbol 87373-XX				
Active Ingredient(s) and/or representative test compound(s) Deltamethrin		Date July 31, 2014			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor		Product Name Deltamethrin Technical			
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).					
SECTION II: GENERAL C	OFFER TO PAY				
[Required if using the cite-all method or when using the cite-all option under the select	ive method to satisf	y one or more data requirements]			
I hereby offer and agree to pay compensation, to other persons, with regard to	the approval of this	application, to the extent required by FIFRA.			
SECTION III: CERTI	FICATION				
l certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.					
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obt⊾ined			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of thei. delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.					
l certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
Date Typed or Printed Name and Title July 31, 2014 Jane M. Miller, Agent					

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.



agros Chemicals India Ltd.

"Jhaver Centre" Rajah Annamalai Building

IV Floor, 72, Marshalls Road

Egmore, Chennai-600 008, Tamilnadu, India. Phone: +91 44 4200 7400 / 424 / 426

Fax : +91 44 2858 7873 E-mail : info@tagros.com Web : www.tagros.com

July 21, 2014

Mr. Mark Suarez
Product Manager, PM Team 13
Herbicide Branch, Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

SUBJECT: Authorization to Rely on Data Submitted by Tagros Chemicals India, Ltd.

Dear Mr. Davis:

Tagros Chemicals India, Ltd. hereby authorizes the U.S. Environmental Protection Agency to refer to data previously submitted by Tagros under MRID Nos. 47866501, 47866502, 47866503 and 48623201 in support of an application submitted by Argite, LLC, 102 Guymon Court, Morrisville, NC 27560, for the registration of its Deltamethrin Technical.

This authorization for Argite to rely on the above-mentioned data is as follows: (1) None of the data on file is to be released to or reviewed by Argite or any other person unless specifically authorized by Tagros; (2) Argite has no ownership interest whatsoever in any of Tagros' data and has no right to hard copy or to benefit from these data other than expressly set forth in this letter; (3) This authorization shall not be construed as authorization to use or consider Tagros' data, directly or indirectly, in support of any other applications by Argite, and; (4) This authorization shall not be transferred by Argite to any other company in any manner whatsoever without the express prior written authorization by Tagros.

If you have any questions concerning this authorization or need further information, please contact me at +91 (44) 4200 7419.

Thank you for your assistance.

Sincerely,

Rajesh Mathew/ General Manager

Tagros Chemicals India, Etd





Phone: 022 - 4290 0800 (13 Lines) Telefax: 022-4290 0811

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	DATA	MATRIX			
Date July 31, 2014			EPA Reg. No./File Symbol 87373-XX		Page 1 of 6
Applicant's/Registrant's Name & Address		Product:			
Argite, LLC c/o Biologic, Inc. 115 C	btuse Hill Road Brookfield, CT 06804		Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830-1550	Product Identity and Composition	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1600	Description of Materials Used to Produce the Product	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1620	Description of Production Process	4 7866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830-1650	Description of Formulation Process				1
830.1670	Discussion of Formation of Impurities	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1700	Preliminary Analysis	47866502	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1750	Certified Limits	47866501	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1800	Enforcement Analytical Method	47866502	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.1900	Submittal of Samples				2
830.6302	Color	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6303	Physical State	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6304	Odor	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6313	Stability to normal & elevated temp., metal, metal ion	47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
830.6314	Oxidation/Reduction				3
830.6315	Flammability / Flame Extension				4
830.6316	Explodability				5
Signature			Name and Title	<u> </u>	Date
16 Maria	2.11		Lawrence A. Miller, Agent		07/31/2014

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		DATA M	ATRIX			
Date July 31, 2014				EPA Reg. No./File Symbol 87373-XX	-	Page 2 of 6
Applicant's/Registrant's Name & A	ddress			Product		
Argite, LLC c/o Biologic, Inc. 115 C	Obtuse Hill Road Brookfield, CT 06804			Deltamethrin Technical		
Ingredient Deltamethrin						
Guideline Reference Number	Guideline Study Name		MRID Number	Submitter	Status	Note
330.6317	Storage Stability	48623201	43623201	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.6319	Miscibility					6
330.6320	Corrosion Characteristics	48623201	4 3623201	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.6321	Dielectric Breakdown Voltage					7
330.7000	рН		47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7050	UV/Visible Spectrum		47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7100	Viscosity					8
330.7200	Melting Point/ Melting Range		√47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7300	Density		√47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7370	Dissociation Constant					9
330.7570	Octanol/Water Partition Coefficient		47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7840/60	Water Solubility		47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
330.7950	Vapor Pressure		47866503	TAGROS CHEMICALS INDIA, LTD.	PERM	
Signature				Name and Title		Date
1 13	the deal of			Lawrence A. Miller, Agent		07/31/2014
Based on EPA Form 8570-35	(9-97) Electronic and Paper versions available	e. Submit only Pape	er version.	Agency Ir	ternal Use Co	ру

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	DAT	A MATRIX			
Date July 31, 2014		EPA	Reg. No./File Symbol 87373-XX		Page 3 of 6
Applicant's/Registrant's Name	& Address	Product:			
Argite, LLC c/o Biologic, Inc. 1	15 Obtuse Hill Road Brookfield, CT 06804		Deltamethrin Technical		
Ingredient Deltamethrin					
Guideline Reference Number	Guideline Study Name	MRID	Submitter	Status	Note
835.2120	Hydrolysis				10
850.2100	Avian Oral Toxicity				11
850.1075	Freshwater Fish Toxicity				11
850.1010	Acute Toxicity Freshwater Invertebrates				11
870.1100	Acute Oral Toxicity	CITE-ALL	Bayer Environmental Science	Pay	
870.1200	Acute Dermal Toxicity	CITE-ALL	Bayer Environmental Science	Pay	
870.1300	Acute inhalation Toxicity	CITE-ALL	Bayer Environmental Science	Pay	
870.2400	Primary Eye Irritation	CITE-ALL	Bayer Environmental Science	Pay	
870.2500	Primary Dermal Irritation	CITE-ALL	Bayer Environmental Science	Pay	
870.2600	Dermal Sensitization	CITE-ALL	Bayer Environmental Science	Pay	
870. 6100	Delayed Neurotoxicity				12
870.6200	Acute Neurotoxicity	CITE-ALL	Bayer Environmental Science	Pay	
870.3100	90-Day Oral Toxicity (Rodent)				13
870.3150	90-Day Oral Toxicity (Non-Rodent)				13
870.3250	90-Day Dermal Toxicity	CITE-ALL	Bayer Environmental Science	Pay	
870.3465	90-Day-Inhalation Toxicity			<u> </u>	14
870.6100	A6-Day Delayed Neurotoxicity		<u> </u>	<u> </u>	12
870.6200	90-Day Neurotoxicity	CITE-ALL		Pay	+
Signaturé	12%		Name and Title		Date
- Burn	35 (3-97) Electronic and Paper versions available. Submit only		Lawrence A. Miller, Agent		07/31/2014

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Date July 31, 2014		T	EPA Reg. No./File Symbol 87373-	xx	Page 4 of 6	
pplicant's/Registrant's Name & Address		Product:				
Argite, LLC c/o Biologic, Inc. 115 C	Obtuse Hill Road Brookfield, CT 06804	_ 	Deltamethrin Technical	Deltamethrin Technical		
Ingredient Deltamethrin						
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
870.6200	90-Day Neurotoxicity	CITE-ALL	Bayer Environmental Sciences	Pay		
870.4100	Chronic Oral Toxicity				15	
870.4200	Carcinogenicity				15	
870.3700	Prenatal Development Toxicity	CITE-ALL	Bayer Environmental Sciences	Pay		
870.3800	Reproduction and Fertility Effects	CITE-ALL	Bayer Environmental Science	Pay		
870.6300	Developmental Neurotoxicity				16	
870.5100	Bacterial Reverse Mutation Assay	CITE-ALL	Bayer Environmental Science	Pay		
870.5300	In vitro Mammalian Cell Assay	CITE-ALL	Bayer Environmental Science	Pay		
870.5385	In vivo Cytogenetics	CITE-ALL	Bayer Environmental Science	Pay		
870.7485	Metabolism and Pharmacokinetics				17	
870.7200	Companion Animal Safety				18	
870.7600	Dermal Penetration				19	
870.7800	Immunotoxicity	CITE-ALL	Bayer Environmental Science	Pay		
SS.1095	Pet Collar Residue Transfer	CITE-ALL	Bayer Environmental Science	Pay		
	5					
Signature			Name and Title		Date	
- Theren			Lawrence A. Miller, Agent		07/31/2014	

DATA MATRIX FOOTNOTES

- 1. Description of Formulation Process: Not applicable because the product is a TGAI/MP.
- 2. Submittal of Samples: Not required at this time.
- 3. Oxidation/Reduction: Not applicable. Product does not contain oxidizing or reducing agents.
- 4. Flammability / Flame Extension: Not applicable. Product does not contain combustible liquids.
- Explodability: Not applicable. Product is not potentially explosive.
- 6. Miscibility: Not applicable. Product is not intended for dilution with petroleum solvents.
- 7. Dielectric Breakdown Voltage: Not applicable. Product is not intended for use around electrical equipment.
- 8. Viscosity: Not required because product is a solid.
- 9. Dissociation Constant: Not required since there is no acidic or basic functionality in the Deltamethrin molecule. The measurement of pKa is only applicable to molecules which have an acid group (carboxylate, phenol or phosphoric acid for example) or basic group (amine). None of the methrin compounds fall into this class being neutral molecules.
- 10. Hydrolysis: Not required since the proposed label is intended only for the formulation of indoor use products.
- 11. Avian Oral Toxicity; Freshwater Fish Toxicity, and; Acute Toxicity Freshwater Invertebrates: Not required since the product is intended only for the formulation of indoor use products having no potential for toxicity to birds and aquatic organisms.
- 12. Delayed Neurotoxicity (Acute and 28-Day): Not required since this product is not an organophosphate or structurally related to other substances that may cause acute or delayed neurotoxicity.
- 13. 90-Day Oral Toxicity (Rodent and Non-Rodent): Not required since this product is intended only for the formulation of non-food use products.
- **14. 90-Day Inhalation Toxicity:** Not required since this is a manufacturing use product intended to formulate end-use products that are not likely to result in prolonged inhalation exposure to humans.
- **15. Chronic Oral and Carcinogenicity:** Not required since this product is intended for the formulation of indoor non-food use products, which are not likely to result in significant human exposure over a considerable portion of the human life span.

- **16. Developmental Neurotoxicity:** Not required since this product is not expected to cause treatment-related neurological effects in adults or offspring and the exposure for its intended use is minimal.
- **17. Metabolism and Pharmacokinetics:** Not required since chronic toxicity and carcinogenicity studies are not required to support the intended use of this product.
- **18. Companion Animal Safety:** Not required since this is a manufacturing use product not applied directly to companion animals. Registrants of end-use products intended for use on companion animals containing this and other active ingredients may provide safety data to support the registrations of their end-use formulations.
- **19. Dermal Penetration:** Not required since this is a manufacturing use product intended to formulate end-use products that are not likely to result in prolonged dermal exposure to humans.

Deltamethrin Technical

An Insecticide for Formulation Use Only

Active Ingredient:	
Deltamethrin*:	98.5%
Other Ingredients:	
TOTAL	
*(1R,3R)-3(2,2-dibromovinyl)-2,2-dimethyl-cyclopropane-carboxyl	ic acid (S)-alpha-cyano-3-phenoxybenzyl ester

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID	
If Swallowed:	Immediately call a poison control center or doctor for treatment advice.
	Do not induce vomiting unless told to do so by a poison control center or
	doctor. Have person sip a glass of water if able to swallow. Do not give
	anything by mouth to an unconscious person.
If Inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance,
	then give artificial respiration, preferably mouth-to-mouth, is possible. Call a
	poison control center or doctor for further treatment advice.
If on Skin or	Take off contaminated clothing. Rinse skin immediately with plenty of water
Clothing:	for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in Eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	Remove contact lenses, if present, after the first 5 minutes, then continue
	rinsing eye. Call a poison control center for treatment advice.
	HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this product, contact the National Pesticide Information Center, 1-800-858-7378. You may also contact the National Poison Control Center, 1-800-222-1222 for emergency medical treatment information.

FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

EPA Reg. No. 87373-X	EPA Est. No. XXXXX-XXX-XXX
Net Weight:25 kg (55.12 lbs50 kg (110.23 lbs.)
Manufactured for:	

Argite, LLC 102 Guymon Court Morrisville, NC 27560

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

May be fatal if swallowed. Harmful if inhaled or absorbed through skin. Avoid breathing dust and contact with eyes, skin or clothing. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Skin exposure may result in a sensation described as a tingling, itching, burning or prickly feeling. Onset may occur immediately to 4 hours after exposure and may last 2-30 hours, without damage. Wash exposed areas once with soap and water. Relief from skin sensation may be obtained by applying an oil-based cream.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Intended for the formulation into an insecticide for the following uses ONLY:

- 1) Pet collars and topical application to companion animals;
- 2) Uses for which U. S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s). This product may be used to formulate products for any additional uses not listed on the technical label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such uses.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container, in a cool dry locked area. Store separately from other pesticides, fertilizers, food or feed to prevent contamination.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling: Nonrefillable containers. Do not reuse or refill this container. LDPE/Metal Drum with liner: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling, if available, or dispose of liner in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke. Offer drum for recycling or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY

Argite, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purposes stated on such label only when used in accordance with the directions under normal use conditions. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Argite, LLC To the extent consistent with applicable law, Argite, LLC shall not be liable for consequential, special or indirect damages resulting from the use or handling of this product. To the extent consistent with applicable law, the exclusive remedy of any Buyer or User of this product and any and all losses, injuries, or damages resulting from or in any way arising from the use, handling, or application of this product, whether in contract, warranty, tort negligence, strict liability, or otherwise, shall not exceed the purchase price of this product. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer. ARGITE, LLC MAKES NO WARRANTIES OR MERCHANTABILITY OR FITNESS FOR ANY PARTICULAR PURPOSE NOR ANY OTHER EXPRESSED OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

FOR		USE	

FILE SYMBOL	
	•
REGISTRATION NO.	
8/3/3	- E

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

DATE	SUBMITT	ED BY (V)
SUBMITTED	APPLICANT	BASIC SUPPLIER
08/05/14		
·		
	# .	
	·	
		,

Do Not Write Comments,
Formula, or Parts of Formula
on This Envelope

NOTE

It shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharmacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any information relative to formulas of products acquired by authority of Section 4 of the "Federal insecticide, Fungicide, and Rodenticide Act."

